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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

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October 5, 1999

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 5 (September 1999)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during September 1999.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During September 1999, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities related to remediation of residential lots and remote fill areas. Major tasks performed by ENTACT included soil sampling and analysis activities and remediation of 32 residential lots. The residential lots which were remediated in September 1999 are summarized in the Monthly Progress Report (Table 1, attached). Through September 1999, ENTACT has completed remedial activities at 667 residential lots.
- During September 1999, ENTACT also continued with efforts related to remediation of the Taracorp pile. Major tasks performed by ENTACT included: (1) continuation of backfill of screened residential soils on the industrial site; (2) completion of the installation of the clay layer above the geosynthetic cover system on the Taracorp pile; (3) initiation of the placement of the topsoil cover on the Taracorp pile; (4) site surveying; and (5) related activities.



- On September 7, 1999, the Group's project coordinator issued a voluntary progress report to EPA.
- On September 7, 1999, ARCADIS Geraghty & Miller, Inc. ("ARCADIS") submitted the Pre-Design Investigation Work Plan for Groundwater to EPA on behalf of the Group.
- On September 13, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on September 16, 1999 to document the results of the meeting.
- On September 20, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee. During the September 20, 1999 meeting, ENTACT personnel reported that the testing of soil samples from Triangle Park indicated that lead concentrations were below EPA's performance criteria. ENTACT issued a report to project participants on September 24, 1999 to document the results of the meeting.
- On September 20, 1999, the Group's project coordinator received EPA's draft comments on the proposed groundwater monitoring well locations at the industrial site, Eagle Park Acres, and Venice Township. The comments were subsequently provided to ARCADIS personnel and representatives of the Group's Technical Committee for review and consideration.
- On September 27, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee.
- During September 1999, ARCADIS personnel continued project planning efforts associated with the implementation of the pre-design investigation for groundwater.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Data from soil sampling activities performed by ENTACT during September 1999 in residential lots and remote fill areas have previously been provided by ENTACT personnel to EPA and have been used as the basis for defining soil excavation depths.

- Data collected from air monitoring activities, soil screening activities, select fill soil testing, backfill compaction testing, and from liner installation QA/QC testing at the industrial site are maintained by ENTACT personnel and are available for inspection by EPA and ACOE personnel at the site.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- As noted above, ARCADIS submitted the Pre-Design Investigation Work Plan for Groundwater to EPA on September 7, 1999.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- During October 1999, ARCADIS personnel will continue efforts to address EPA's comments on the Pre-Design Investigation Work Plan for Groundwater. After the locations of monitoring wells to be installed during the pre-design investigation have been finalized, the Group will initiate efforts to secure access to those properties.
- During October 1999, ENTACT will continue soil sampling activities and soil excavation and restoration of residential lots and remote fill lots. Residential and remote fill lots to be addressed by ENTACT personnel during October 1999 will be coordinated on a daily basis with ACOE representatives and will be discussed with EPA during weekly progress meetings. ENTACT also anticipates at the present time that the paving of alleys in Venice Township and other off-site areas will be performed.
- During October 1999, ENTACT will also continue activities associated with remediation of the Taracorp pile. Activities to be performed by ENTACT personnel during October 1999 are expected to include: (1) continued backfill of excavated industrial areas; (2) completion of the placement of the topsoil layer on the Taracorp pile; (3) seeding of the topsoil layer on the Taracorp pile after a seeding plan has been approved by EPA; (4) initiation of the installation of the concrete channels; (5) installation and possible completion of the storm water sewer system; and (6) related activities.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

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6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

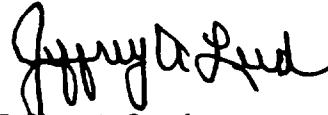
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller (w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
RESIDENTIAL LOTS

Monthly Progress Report - September

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone	Sod	HEPA
637	1027	Iowa	6	2 lots	9/2/99	9/3/99	9/3/99	9/17/99	Rejected
638	903	McCambridge	3	2 lots	9/1/99	9/3/99	9/3/99	9/21/99	Rejected
640	2732	Cayuga	12		9/3/99	hold	hold	hold	Rejected
641	1619/21L	Edison	12		9/3/99	9/7/99	9/7/99	9/9/99	Empty Lot
642	2015	Dewey	3		9/8/99	9/8/99	9/8/99	9/22/99	
643	2210	Dewey	6		9/8/99	9/8/99	9/8/99	9/21/99	Rejected
644	2233	Dewey	3		9/8/99	9/8/99	9/8/99	9/21/99	Rejected
645	2103	Missouri	6		9/8/99	9/9/99	9/9/99	hold	Rejected
646	2205	Missouri	6		9/9/99	9/10/99	9/10/99	9/22/99	Rejected
647	2204	Ohio	3		9/10/99	9/13/99	9/13/99	9/23/99	Rejected
648	2100	Ohio	3		9/13/99	9/14/99	9/14/99	9/24/99	Rejected
649	2235	Missouri	3		9/13/99	9/13/99	9/13/99	9/24/99	Rejected
650	2058	14th	12		9/15/99	hold	hold	hold	
651	2074	14th	6		9/14/99	9/15/99	9/15/99	9/16/99	
652	1731	Rhodes	12		9/16/99	9/16/99	9/16/99	9/30/99	
653	522	Meredocia	12		9/16/99	9/17/99	9/17/99	9/28/99	ENTACT
654	1234	Edwardsville	6		9/16/99	9/17/99	9/17/99	9/30/99	
655	2009	Edwardsville	6		9/17/99	9/21/99	9/21/99	9/29/99	
657	2013	Edwardsville	6	2 lots	9/17/99	9/21/99	9/21/99	9/21/99	
659	1050	Washington	3	2 lots	9/17/99	9/21/99	9/21/99	9/24/99	
661	1022	State	12	2 lots	9/20/99	9/21/99	9/21/99	9/30/99	Rejected
662	2288	Edison	3		9/21/99	9/23/99	9/23/99		
663	2249	Lee	3		9/21/99	9/23/99	9/23/99		
664	2421	Delmar	3		9/22/99	9/23/99	9/23/99		
665	1322	Madison	12		9/27/99	9/27/99	9/27/99	n/a	
666	2243	Lee	6		9/28/99	9/29/99	9/29/99		
667	621	Niedringhaus	12		9/30/99				